

KAREN WOHLFORTH (KD0235)
ZELDA STEWART (ZES8375)
299 Broadway suite 1700
New York, New York 10007
Tel (212) 619-2457
Fax (212) 285-0531
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Civ. Case No. 05-8501((KMK)(JCF)

JODY CONCEPCION,

Plaintiff

-against-

THE CITY OF NEW YORK, POLICE OFFICER
ALEXIS FERNANDEZ, "JANE and JOHN DOES" 1-15,
and the REPUBLICAN NATIONAL COMMITTEE,

Defendants
-----X

**NOTICE OF PLAINTIFF'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS UNDER FRCP RULES 37,
34 AND 26 and LOCAL CIVIL RULE 33**

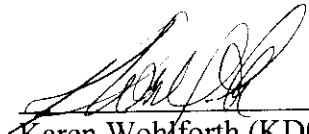
PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Supporting Declaration of KAREN WOHLFORTH, ESQ., plaintiffs move to compel production of the following documents from either defendant City of New York or Republican National Committee, and for sanctions pursuant to Rule 37 (4):

- 1) "City Agreement for the 2004 Republican National Convention;"
- 2) "Site City Agreement" or "City Site Agreement;"

Oral argument shall be on a date and at a time to be designated by the Court.

Dated: March 23, 2006

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Karen Wohlforth', is written over a horizontal line.

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